## EXHIBIT 59

# MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

## PUBLIC REDACTED VERSION

#### Message

From: Sam Heft-Luthy [heftluthy]

Sent: 10/14/2020 9:20:01 PM

To: privacysurfaces-team [privacysurfaces-team ]; Jonathan McPhie [jmcphie

Subject: Fwd: Program Review: Privacy Surfaces

Deck and notes from today's review. Highlights:

- Some good discussion on better metrics, which point to two "philosophies of success" in privacy (I think both of which are important):
- o **User trust and affect -** giving users a *sense* of the system as working to their benefit. Important but gameable without actually improving any of the underlying conditions, remains our higher-level goal
- o Concrete risk models being addressed users reckon with tradeoffs and are in a position of self-determination w.r.t. how their data is shared. More tangible, but more difficult in Privacy than Security because of our tangled consent approach
- Rahul called out a concern that we're stretching ourselves thin, especially given that we are doing a lot to get users to understand a system that is just fundamentally difficult to get (WAA, GAP, etc.). He argues that we should prioritize landing our short-term commitments for N3 consent, any long-term work to reimagine consent, and efforts like Reassure. Greg mentioned that having the right channels in place when that reimagination comes is still vital, but Rahul also said that given, say, PAA, that reimagination may not be too far off!
- Good talk on executing on PA partnerships in general, a tension between carrot and the stick. Is privacy a tax, which means PDPO needs to be more aligned in wielding a big stick, or is it a benefit to PA goals, which means PDPO needs to be more responsive to PA needs. Probably both, but for us to think through as we work with Jonathan McPhie

----- Forwarded message -----From: Sam Heft-Luthy < heftluthy Date: Wed, Oct 14, 2020 at 1:30 PM Subject: Program Review: Privacy Surfaces To: Rahul Roy-Chowdhury <rahulro >, Sarah Hammond <shammond McPhie < jmcphie >, Daniele Souza <danielesouza >, Stephan Micklitz >, Bénigne Deprey <benigne >, Wei Tu <weitu >, Mimi <micklitz >, Othar Hansson <othar Underwood <munderwood >, Mark Risher >, Annie Klemp <annieklemp >, Meagan Pi <meagan <risher >, Reza >, Jeffrey Korn <ilk Behforooz <reza >, <ggelke >, Greg Fair <gregfair >, Scott Dougall <dougall >, Angela Alvarez >, <justchen >, Camie Hackson <camie <angelaalvarez >, Micha Segeritz < mseg >, Willa Chalmers <willa , Joshy Joseph <joshy >, <talherman >, Claire Herrin <cherrin Anne Schaefer <aschaefer Eduardo Tejada <etejada >, Sam Heft-Luthy < heftluthy

Thank you all for coming to today's review.

Here is the deck we ran through:

 $\underline{https://docs.google.com/presentation/d/1JzBPuzC3RgoGDd1YzjwD0mM2aI5h7dQrJpCvWq3LhnY/edit\#slide=id.g285eae3f80\ 2\ 1}$ 

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And here are the notes (thanks Jonathan!):

 $\frac{https://docs.google.com/document/d/1LWXmOOUGdHZ1l2J2ffHevK9NrpskF\_mdurFm52ePVm8/edit?ts=5f8}{74ae0}$ 

### **Program Review: Privacy Surface**

Wed Oct 14, 2020 11am - 12pm

SVL-CRSM1265-5-Hunter2 (3) [GVC, Phone] (map)

Join with Google Meet meet.google.com/cit-bico-xig

Join by phone +1 419-969-2071

#### More phone numbers

- Daniele Souza
- · Rahul Roy-Chowdhury
- Reza Behforooz
- · Greg Fair
- Jonathan McPhie
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- Micha Segeritz
- ggelke
- justchen
- talherman
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- Angela Alvarez
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- Eduardo Tejada
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- Willa Chalmers
- Stephan Micklitz
- Wei Tu
- · Mark Risher
- Claire Herrin
- Meagan Pi
- · Camie Hackson
- · Jeffrey Korn
- Othar Hansson
- Annie Klemp

**Topic Owners: Othar** 

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Program Reviews are pre-determined and are aligned thematically to Core's four themes: Helpful, Trust, Excellence and Efficiency. Program Reviews will occur monthly and depending on the theme, your program review may occur 3 or 4 times a year. go/userpdpo-reviewguide

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